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February 21, 2020

VIA ECF

Hon. Gabriel W. Gorenstein
Chief U.S. Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
Courtroom 6B
New York, New York 10007-1312

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Re: *Angel Hernandez v. Office of the Commissioner of Baseball, et al.*
No. 18 Civ. 9035 (JPO) (GWG)

Dear Judge Gorenstein:

We represent Defendants in the above-referenced matter and respectfully submit this joint request with Plaintiff for a briefing schedule for the parties' respective summary judgment motions.

As noted in Plaintiff's February 7, 2020 letter (Dkt. No. 130), both sides intend to move for summary judgment. In accordance with Judge Oetken's Individual Practice 3(E)(iv), which provides that briefing for cross-motions for summary judgment on the same or overlapping issues be seriatim, the parties have agreed that Plaintiff will be "Party A" and Defendants will be "Party B." The parties respectfully request that the Court so-order a briefing schedule for the parties' motions as follows, which will commence within 14 days of the close of all discovery on March 13, 2020 (*see* Dkt. Nos. 28 ¶ 11, 131):

On or before March 27, 2020	Plaintiff files motion for summary judgment.
On or before April 24, 2020	Defendants file opposition to Plaintiff's motion and cross-motion for summary judgment
On or before May 22, 2020	Plaintiff files opposition to Defendants' cross-motion and reply in support of his motion.
On or before June 12, 2020	Defendants file reply in support of their cross-motion.

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The parties request the schedule set forth above in consideration of Judge Oetken's rule regarding combined briefing for each side's second round of submissions; anticipated related Daubert briefing; and potential sealing applications.

The parties appreciate the Court's consideration of this joint request.

Respectfully submitted,

/s/ Adam M. Lupion

Adam M. Lupion

cc: All Counsel (via ECF)